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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**SUPPLEMENTAL DECLARATION OF  
JORDAN R. JAFFE**

**Hearing:**

Date: May 3, 2017

Time: 8:00 a.m.

Place: 8, 19<sup>th</sup> Floor

Judge: The Honorable William H. Alsup

1 I, Jordan R. Jaffe, hereby declare as follows.

2 1. I am a member of the bar of the State of California and a partner with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached hereto as Exhibit 114<sup>1</sup> is a true and correct copy of a document produced  
7 by Defendants in this action bearing Bates Number UBER00012755.

8 3. Attached hereto as Exhibit 115 is a true and correct copy of a document produced  
9 by Defendants in this action bearing Bates Number UBER00012750.

10 4. Attached hereto as Exhibit 116 is a true and correct copy of a document produced  
11 by Defendants in this action bearing Bates Number UBER00016410.

12 5. Attached hereto as Exhibit 117 is a true and correct copy of a document produced  
13 by Defendants in this action bearing Bates Number UBER00016400.

14 6. Attached hereto as Exhibit 118 is a true and correct copy of a document produced  
15 by Defendants in this action bearing Bates Number UBER00016401.

16 7. Attached hereto as Exhibit 119 is a true and correct copy of a document produced  
17 by Defendants in this action bearing Bates Number UBER00016402.

18 8. Attached hereto as Exhibit 120 is a true and correct copy of a document produced  
19 by Defendants in this action bearing Bates Number UBER00016403.

20 9. Attached hereto as Exhibit 121 is a true and correct copy of a document produced  
21 by Defendants in this action bearing Bates Number UBER00016404.

22 10. Attached hereto as Exhibit 122 is a true and correct copy of a document produced  
23 by Defendants in this action bearing Bates Number UBER00016405.

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26 <sup>1</sup> For clarity, this Declaration begins with Exhibit 114 because Waymo submitted Exhibits 1-  
27 60 with the Declaration of Jordan R. Jaffe that it submitted in support of its opening brief on  
28 March 10, 2017 (Dkt. 25-6) and Exhibits 61-113 with the Declaration of Jordan R. Jaffe that it  
submitted in support of its reply brief on April 21, 2017 (Dkt. 248).

1           11.     Attached hereto as Exhibit 123 is a true and correct copy of a document produced  
2 by Defendants in this action bearing Bates Number UBER00016406.

3           12.     Attached hereto as Exhibit 124 is a true and correct copy of a document produced  
4 by Defendants in this action bearing Bates Number UBER00016407.

5           13.     Attached hereto as Exhibit 125 is a true and correct copy of a document produced  
6 by Defendants in this action bearing Bates Number UBER00016408.

7           14.     Attached hereto as Exhibit 126 is a true and correct copy of a document produced  
8 by Defendants in this action bearing Bates Number UBER00012740.

9           15.     Attached hereto as Exhibit 127 is a true and correct copy of a document produced  
10 by Defendants in this action bearing Bates Number UBER00012741.

11          16.     Attached hereto as Exhibit 128 is a true and correct copy of a letter from counsel  
12 for Defendants to counsel for Waymo, dated April 25, 2017.

13          17.     Attached hereto as Exhibit 129 is a true and correct copy of an article titled "Uber's  
14 self-driving car boss, Anthony Levandowski, is stepping aside amid legal fight with Waymo,"  
15 dated April 27, 2017, downloaded from [http://www.businessinsider.com/anthony-levandowski-no-](http://www.businessinsider.com/anthony-levandowski-no-longer-leads-uber-self-driving-cars-2017-4)  
16 [longer-leads-uber-self-driving-cars-2017-4](http://www.businessinsider.com/anthony-levandowski-no-longer-leads-uber-self-driving-cars-2017-4).

17          18.     Attached hereto as Exhibit 130 is a true and correct copy of excerpts of the  
18 deposition transcript of William Grossman, dated March 24, 2017.

19          19.     Attached hereto as Exhibit 131 is a true and correct copy of Defendants' Objections  
20 and Responses to Plaintiff Waymo LLC's Notice of Deposition of Kevin Faulkner and Requests  
21 for Production of Documents and Things, dated April 17, 2017.

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1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct.

3  
4 DATED: May 8, 2017

/s/ Jordan R. Jaffe

Jordan R. Jaffe